

## **APPENDIX S1A**

### **Notes accompanying the Sustainability Appraisal of Policies - Appendix S1 (Pages 1-5)**

#### **SA Objective 1. Housing**

##### **Likely Significant Effects**

As described in the Allocation of Housing Development (Policy 2), the preferred housing requirement for Trawden specified in the Pendle Core Strategy is for 87 new dwellings in the period 2011-2030. Applying a 10% uplift and adjusting for completions to date and for planning permissions granted and not lapsed, the requirement for the remaining period is 39 houses. The total number of houses allocated on sites in the plan exceeds this number by a wide margin. Policy 3 (Windfall Sites) supports appropriate developments within the Settlement Boundaries of Trawden and Cottontree and is likely to add further numbers in the plan period.

Therefore overall the TFNP policies have been assessed as having a significant positive effect on this objective. There is one small qualification: the requirement in Policy 4 for additional off-road parking spaces over and above the numbers specified in the national and regional standards may have a very minor negative effect by slightly reducing the number of houses to be built on a particular site.

##### **Mitigation**

The requirement for above standard numbers of off-road spaces is deemed necessary due to the exceptional character of parts of the parish: narrow lanes, limited access and lack of road space. There is further mitigation in that the Policy on Off-road parking (Policy 4) supports appropriate sites which offer additional parking for communal use, over and above the numbers required by the increased minimum spaces per dwelling.

##### **Assumptions**

None identified.

##### **Uncertainties**

The extent to which new housing development meets local needs will be dependent on the mix of housing delivered (in terms of size, type and tenure).

#### **SA Objective 2. Employment**

##### **Likely Significant Effects**

The construction of new dwellings would support the construction sector both within and outside the Parish and has the potential to create employment opportunities as well as increased economic activity in the local and wider supply chain. However, the extent to which the jobs created benefit the Parish's residents will depend on the number of jobs created and the recruitment policies of prospective employers. In the longer term (once development is complete), the increase in local population could boost the local labour market and increase economic activity in the local community. However, the specific Site Allocations in Policy 2 may have a minor negative effect on employment by giving preference to brownfield sites. Of the 6 selected sites two could result in the displacement of industrial units.

The Policy (5) in support of Wycoller Country Park and the Policies (6, 7 and 9) in support of heritage, special townscape character and open spaces are intended to encourage tourism with a consequent increase in employment in that sector.

Overall, the set of Policies in the TFNP has been assessed as having a minor positive effect on this objective.

##### **Mitigation**

None identified.

##### **Assumptions**

None identified.

##### **Uncertainties**

The extent to which job creation is locally significant will depend on the types of jobs created (in the context of the local labour market) and the recruitment policies of prospective employers.

#### **SA Objective 3. Sustainable Living and Revitalisation**

##### **Likely Significant Effects**

Residential development has the potential to improve the viability and vitality of existing services and facilities in the Parish, although this effect is likely to be limited by the fact that Trawden Forest is a

dormitory parish. But an increase in the number of residents can only increase the use of communal facilities such as the Community Centre. New development may also encourage and support investment in the provision of new services and facilities, for example the proposed Village Store/Post Office on the site of the former library building. This could help enhance the accessibility of existing and prospective residents to services and facilities which have been lost in recent times. Larger services such as secondary schools, as well as employment opportunities are predominantly outside the Parish, but Trawden has its own Primary School, Doctors' Surgery and Pharmacy, all of which will benefit from new development. The TFNP has been created to encourage the development of smaller sites, appropriate to the semi-rural nature of the parish. This will reduce the potential for the type of growth that could create increased pressure on these village services, especially the village school.

Trawden is fortunate in being devoid of any pockets of deprivation. But well-designed housing developments on brownfield sites will improve the appearance of the village and raise the quality of the housing stock.

Overall, the Policies of the TFNP have been assessed as having a positive effect on this objective.

#### **Mitigation**

The emerging Pendle Local Plan's policies should ensure that new development supports specific regeneration opportunities where possible.

Developer contributions towards key services and facilities should be sought where appropriate.

#### **Assumptions**

None identified.

#### **Uncertainties**

There are uncertainties as to how future needs for school places will be met. This is outside the scope of the Trawden Forest Neighbourhood Plan. The current moves to form a Schools' Academy Chain in the area are being monitored.

### **SA Objective 4. Health and Wellbeing**

#### **Likely Significant Effects**

The construction of new housing may have a localised negative effect on the health and wellbeing of residents, particularly those with poor respiration, who are in close proximity to development sites and along transport routes within the Parish. Effects may include, for example, respiratory problems associated with construction traffic and dust. However, these effects are expected to be temporary and not significant.

The TFNP's Housing Development Policies (1-4) largely restrict development to within the Settlement Boundaries, and preserve the green areas surrounding the villages. This encourages access to the open countryside.

Policies 5 and 9 (Supporting Wycoller Country Park and Protecting Open Spaces) are intended to ensure that there are places available for exercise and recreation.

Policy 8 (Locally Valued Resources) supports the retention of facilities such as the community centre and Doctors' surgery, which are important for the wellbeing of residents.

Overall, the policies of the TFNP have been assessed as having a positive effect on this Health and Wellbeing objective.

#### **Mitigation**

None identified

#### **Assumptions**

None identified.

#### **Uncertainties**

None identified

### **SA Objective 5. Transport**

#### **Likely Significant Effects**

Any new housing development will inevitably increase traffic in the surrounding area. But the TFNP has placed emphasis on small scale developments and it has allocated sites which have the least impact on the Parish's roads. With the exception of two very small sites, all the supported development is alongside the main thoroughfare of the Parish, the B6250. The geography of Trawden Forest makes it very difficult to achieve the objectives of reducing commuting and encouraging sustainable modes of transport. But the Policy (4) concerning Off-road Parking attempts to improve road safety by

encouraging developers to provide additional spaces and thereby reduce on road parking. In addition, Policy 8 protects local resources, the continued existence of which reduces the need for transport to service centres outside the Parish.

Overall, the policies of the TFNP have been assessed as having a mixed positive and negative effect on this objective, although some uncertainty remains.

**Mitigation**

The TFNP Policy on Windfall Sites should give preference to sites with least impact on the transport infrastructure and with the best access to key services and facilities.

**Assumptions**

None identified.

**Uncertainties**

With the increase in home-working, the impact of housing growth on levels of commuting is to some extent uncertain.

**SA Objective 6. Land Use**

**Likely Significant Effects**

The TFNP encourages the reuse of brownfield land. Three of the 6 selected sites are brownfield, and the site North of Dean Street is part brownfield. Only one site (Adjacent to 37 Hollin Hall) is on Greenfield land, and that land is low grade agricultural land. In that the TFNP Policy 2 (Site Allocation) has rejected several larger sites on Greenfield agricultural land it has been assessed as having a positive effect.

The set of TFNP policies as a whole has been assessed as having a positive effect on this objective.

**Mitigation**

The TFNP Policy (3) on Windfall Sites will encourage the effective use of land by re-using land that has been previously developed (brownfield land). Also, where appropriate, that Policy will encourage the use of areas of suitable poorer quality agricultural land in preference to that of a higher quality.

The emerging Pendle Local Plan will contain policies which promote the management of soils on development sites.

**Assumptions**

None identified.

**Uncertainties**

None identified.

**SA Objective 7. Water Resources**

**Likely Significant Effects**

The construction of new development and the growth in resident population associated with the delivery of housing can be expected to increase demand on water resources. However, it is assumed that the numbers of dwellings proposed in the TFNP can be accommodated within the existing water infrastructure. The fact that most of the sites are adjacent to existing mains water and sewage infrastructure along the B6250 should make the impact negligible, therefore their effects on water resource availability are not expected to be significant.

With new developments, the proximity to waterbodies means there is potential for adverse effects on water quality associated with construction activities (through, for example, accidental discharges or uncontrolled surface water runoff from construction sites). This applies especially to the 3 sites immediately adjacent to Trawden Beck. However, it is assumed that the design of new development will include (where appropriate) sustainable urban drainage systems (SUDS) to ensure that all subsequent rainfall will infiltrate surfaces rather than exacerbate any downstream flood risks (which also have temporary effects on water quality).

Overall, the policies of the TFNP have been assessed as having a minor negative effect on this objective.

**Mitigation**

Pendle Council may consider the potential for the emerging Local Plan to include policies to support water company water efficiency activities, including the requirement for new homes to include the optional requirement in the Building Regulations for 110 litres maximum daily allowable usage per person.

It is also recommended that the emerging Pendle Local Plan includes policies that promote water attenuation systems due to the underlying geology of the area.

**Assumptions**

There will be no development that will require diversion or modification of existing watercourses. However, if such measures are required, this could affect local water quality.

**Uncertainties**

None identified.

**SA Objective 8. Flood Risk****Likely Significant Effects**

The TFNP has allocated 3 sites which are in Flood Risk Zone 3. All three sites are adjacent to Trawden Beck which flows down the valley in close proximity to Skipton Road (the B6250). The TFNP Steering Group is aware of the NPPF recommendation that Local Plan policies and proposals should avoid development in areas of flood risk (e.g. Flood Zones 2 and 3). But the Group concluded that these risks were outweighed by their benefits when compared to the other sites in the Site Allocation exercise. Also it can be reasonably assumed that new development proposals which may result in an increase in flood risk will be accompanied by an FRA and incorporate suitable flood alleviation measures (thereby minimising the risk of flooding). The Steering Group has decided to take a sequential risk-based approach, including the application of the 'exception test,' consistent with the NPPF.

Overall, the policies of the TFNP have been assessed as having a negative effect on this objective, although it is recognised that the type and magnitude of effect will be largely dependent on the future location of sites and the type of properties developed.

**Mitigation**

None identified

**Assumptions**

It is assumed that, where appropriate, development proposals would be accompanied by a FRA and that suitable flood alleviation measures would be incorporated into the design of new development where necessary to minimise flood risk.

The TFNP will apply a sequential risk-based approach, including the application of the 'exception test,' consistent with the NPPF.

**Uncertainties**

None identified.

**SA Objective 9. Air Quality****Likely Significant Effects**

The construction of new residential development is likely to have a negative effect on air quality due to, for example, emissions generated from plant and HGV movements during construction. Once dwellings are occupied, the increase in population in the Parish will in-turn generate additional transport movements and associated emissions. On the other hand, several of the sites proposed are currently industrial units which may have a more detrimental effect on air quality than the residential development which replaces them. The TFNP aims to avoid the development of larger sites in areas with poor access and existing congestion. Therefore arguably the plan has a less negative effect than might otherwise be the case.

Overall, the policies of the TFNP have been assessed as having a neutral effect on this objective, although some uncertainty remains.

**Mitigation**

When considering Windfall Sites, careful consideration should be given to the distribution/location of new development to ensure accessibility to key services and facilities to minimise transport emissions.

**Assumptions**

None identified.

**Uncertainties**

The impact of housing growth on levels of commuting is to some extent uncertain. For example a future increase in home-working may have a positive impact by reducing the amount of commuting.

**SA Objective 10. Climate Change****Likely Significant Effects**

Residential development would be expected to increase energy consumption and greenhouse

gas emissions within the Parish. Sources of emissions will include the use of plant, HGV movements and the embodied carbon in materials during construction and domestic energy consumption and vehicle movements once dwellings are occupied.

Notwithstanding the anticipated increase in emissions identified above, per capita emissions of CO<sub>2</sub> have generally fallen, albeit slowly, over the past two decades and residential development could present opportunities for new homes to include low carbon technologies within their design and to use low carbon materials within their construction. Also, as with the Objective of improved Air Quality above, it should be noted that several of the sites proposed are currently industrial units which may have a more detrimental effect on emissions and climate change than the residential development which replaces them. The TFNP aims to avoid the development of larger sites in areas with poor access and existing congestion. Therefore arguably the plan has a less negative effect on emissions than might otherwise be the case.

Overall, the policies of the TFNP have been assessed as having a broadly neutral effect on this objective, although some uncertainty remains.

#### **Mitigation**

The emerging Pendle Local Plan policies could promote high standards of low carbon and energy efficient design including, where appropriate, renewable energy provision. It is acknowledged that policy at the national level limits the ability of local planning authorities to do this as the Code for Sustainable Homes has been discontinued, with some requirements secured through the Building Regulations.

When considering Windfall Sites, careful consideration should be given to the distribution/location of new development to ensure accessibility to key services and facilities.

#### **Assumptions**

None identified.

#### **Uncertainties**

The exact scale of greenhouse gas emissions will be dependent on a number of factors including: the location and accessibility of new development; the design of new development (including in the context of the requirements of Local Plan policies and building regulations); future travel patterns and trends; individual energy consumption behaviour; and the extent to which energy supply has been decarbonised over the plan period.

### **SA Objective 11. Waste and Natural Resources**

#### **Likely Significant Effects**

The construction of new dwellings will require raw materials (such as aggregates, steel and timber). However, the volume of materials required is not expected to be significant (in a regional or national context). Further, it is anticipated that there would be opportunities to utilise recycled and sustainably sourced construction materials as part of new developments.

None of the selected sites has been designated as a Mineral Safeguarding Area.

Residential development will generate waste through construction, although it is anticipated that a proportion of this waste would be reused or recycled. Once dwellings are occupied, there would also be an increase in municipal waste arising. However, it is again anticipated that a proportion of this waste would be reused or recycled.

Overall, the policies of the TFNP have been assessed as having a minor negative effect on this objective.

#### **Mitigation**

Pendle Council should consider the potential for Local Plan policies to encourage the use of recycled and secondary materials in new developments.

The reuse of construction and demolition wastes on site should be promoted.

#### **Assumptions**

It is assumed that the emerging Pendle Local Plan Part 2 will make provision to accommodate additional waste associated with growth in the borough.

#### **Uncertainties**

The exact scale of waste will be dependent on a number of factors including: the design of new development; waste collection and disposal regimes; and individual behaviour with regard to recycling and reuse.

## **SA Objective 12. Biodiversity & Geodiversity**

### **Likely Significant Effects**

The peat moorland and blanket bogs along the fringes of Boulsworth Hill are internationally recognised for their upland birds and plants, and as such the area is designated as a Site of Special Scientific Interest (SSSI), a Special Area of Conservation (SAC) and a Special Protection Area (SPA).

The southern and eastern edges of the Parish lie within this specially protected area, which makes up more than 60% of the area of the Parish. In addition there are two sites of Local Natural Importance (LNI): Flake Hill Moor and Antley Gate, and 9 Biological Heritage Sites. None of the sites selected for development under Policy 2 lies within 1000 metres of any of the above sites of biodiversity.

It is assumed that any residential development arising from Windfall Sites would not directly affect these designated sites because that Policy (3) restricts development to within the Settlement Boundaries. Although any population growth could have indirect negative effects on these assets due to, for example, disturbance arising from increased recreational activity, this is not considered to be significant. The sites supported for development under Policy 2 are mainly brownfield sites, and only one site (adjacent to 37 Hollin Hall) is fully Greenfield. That site is not one which contains priority species nor does it form part of a wildlife corridor, therefore the residential housing policies 1-4 are assessed as having a neutral effect on Biodiversity. Policy 5 which supports Wycoller Country Park is assessed to have a positive effect on biodiversity arising from projects to maintain and enhance habitat within the park, the creation of special areas for wildlife, the provision of bird feeding stations, bat boxes, bird boxes, wildflower areas, and tree planting.

Overall, the policies of the TFNP have been assessed as having a minor positive effect on this objective, although uncertainty remains with regard to the exact type, magnitude and duration of effects.

### **Mitigation**

When assessing Windfall Sites (Policy 3) careful consideration should be given to their suitability, avoiding significant adverse effects on any of the designated sites of biodiversity, and, in areas not designated as such, avoiding loss of habitat of protected species.

### **Assumptions**

None identified.

### **Uncertainties**

None identified.

## **SA Objective 13. Cultural Heritage**

### **Likely Significant Effects**

Trawden's cultural heritage is a key feature of the parish, as indicated by the National Heritage List for England which includes 35 listed buildings and 4 scheduled monuments. The whole parish lies within a conservation areas and there is a Country Park taking in the Wycoller Valley. The Parish also has an emerging Local List of heritage assets to supplement the National List.

Residential development has the potential to adversely affect heritage assets. Adverse effects on these historic and cultural assets may be felt during construction and also in the longer term once development has been completed. Effects may be direct (where development involves the loss of, or alteration to, assets) or indirect (where elements which contribute to the significance of assets are harmed). However, Policy 6 of the TFNP seeks to conserve and enhance local heritage assets by encouraging developments which respect, and where possible enhance, the setting, character and appearance of those assets. Conversely the policy aims to prevent developments which would harm a designated asset unless the public benefits of the developments clearly outweigh the potential harm. Policy 5 of the TFNP supports the preservation of Wycoller Country Park as an attractive tourist destination. All 4 of the parish's Scheduled Monuments lie within the Wycoller Country Park and the policy seeks to prevent developments which would harm those assets or any other designated assets within its boundary.

Overall, the policies of the TFNP have been assessed as having a significant positive effect on this objective.

### **Mitigation**

Policies within the TFNP assume that the emerging Pendle Local Plan will promote high standards of architecture and design.

### **Assumptions**

None identified.

### **Uncertainties**

The exact location of future Windfall developments, the quality of the receiving landscapes and the proximity of sensitive assets to the developments is unknown at this stage.

## **SA Objective 14. Landscape & Townscape**

### **Likely Significant Effects**

The delivery of new dwellings is always likely to result in adverse effects on landscape character. Effects may be felt during construction and once development is complete, although the likelihood of adverse effects occurring and their magnitude will be dependent on the scale, density and location of new development in the context of the landscape sensitivity of the receiving environment. However the level of growth proposed in the TFNP is likely to have minimal impact in this respect, because only one totally greenfield site is proposed for residential development, and that site is for only two dwellings. The emphasis of Policies 1-3 is to restrict development to within the settlement boundaries unless there are mitigating circumstances (which is the case with this particular greenfield site).

There may also be potential for new development to enhance the quality of the built environment and to improve townscapes, particularly where brownfield sites are redeveloped, and it should be noted that the majority of the proposed dwellings in the TFNP will be on such brownfield sites.

Policy 7 of the TFNP seeks to preserve the Townscape Character of selected areas of the Parish by supporting developments only if the proposals have been shown to have regard to the potential impact on the character and appearance of these areas. The policy aims to achieve its objective by insisting that, in the areas designated, proposals should retain trees, frontage walls and hedgerows; retain areas of open space including private yards and gardens: consider the impact on long range views from roads and footpaths: and avoid the demolition of buildings which contribute to the character and appearance of the area.

Overall, the policies of the TFNP have been assessed as having a positive effect on this objective.

### **Mitigation**

Future proposals for Windfall development should be encouraged to make effective use of land by re-using land that has been previously developed (brownfield land).

Detailed policies on high quality design should be contained within the emerging Pendle Local Plan.

### **Assumptions**

None identified.

### **Uncertainties**

The exact location of future Windfall developments, and the quality of the receiving landscapes and townscapes are unknown at this stage.